

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**AUGUST 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	August 1, 2024 through August 31, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$17,911.50
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$376.89
Total interim approval requested:	\$18,288.39

Dated this 10th day of September 2024.

RICHMAN & RICHMAN
Attorneys for the Debtor

By: /s/ Michael P. Richman
Michael P. Richman
Claire Ann Richman
Eliza M. Reyes
122 W Washington Ave, Suite 850
Madison, WI 53703
Tel: (608) 630-899
Fax: (608) 630-8991
mrichman@RandR.law
crichman@RandR.law
ereyes@RandR.law

Richman & Richman LLC

122 W Washington Ave, Suite 850
Madison, WI 53703-2732

INVOICE

Invoice # 993
Date: 09/10/2024

Wisconsin & Milwaukee Hotel LLC
c/o Jackson Street Management LLC
Attn: Mr. Edward G. Carow
731 N. Jackson Street, Suite 420, Milwaukee WI53202

Wisconsin & Milwaukee Hotel LLC/-2024.00023

Chapter 11

Services

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	08/01/2024	1106 - Misc Motions & Court Hearings: phone conferences with MPR and prepare emails to client to advise of settlement and hearing status on Lender's Motion to Compel Payment of adequate protection, including review and email to forward court order regarding same.	CAR	0.50	\$575.00	\$287.50
Service	08/01/2024	1104 - DIP Financing / Cash Collateral: Working travel and preps for hearings on adequate protection motion and case management, including settlement discussion t/cs w/F. DiCastrì, t/cs w/C. Richman and related communications w/ client team (2.0); telephonic court hearing re adequate protection motion and case management (.2); followup t/c w/R. Eckert and emails to client team re same and status (.3)	MPR	2.50	\$750.00	\$1,875.00
Service	08/01/2024	1109 - Asset Analysis & Recovery: prep of emails to appraiser candidates re interview mtgs	MPR	0.30	\$750.00	\$225.00
Service	08/02/2024	1110 - Claim Management Issues: Review Claim #21 filed by CVENT to address same, including possible bases for objections to same.	EMR	0.20	\$450.00	\$90.00
Service	08/05/2024	1110 - Claim Management Issues: Review claims and prepare request for more information from Client re: unpaid invoices and calculation of claims	KAH	2.50	\$275.00	\$687.50

Service	08/06/2024	1109 - Asset Analysis & Recovery: Interview mtg w/J. Jaeger, appraiser (.4); interview mtg w/D. Sangree, appraiser (.3)	MPR	0.70	\$750.00	\$525.00
Service	08/07/2024	1110 - Claim Management Issues: Conduct analysis of proof of claims filed late to determine action to take regarding same	KAH	1.80	\$275.00	\$495.00
Service	08/07/2024	1110 - Claim Management Issues: Prepare email correspondence to Client regarding filed proofs of claim	KAH	0.20	\$275.00	\$55.00
Service	08/07/2024	1110 - Claim Management Issues: Conduct research regarding motion for estimation of claim and objection procedure	KAH	3.50	\$275.00	\$962.50
Service	08/07/2024	1112 - Debtor Meetings & Communications: Prep of agenda for client weekly Zoom mtg on status/strategy (.2); emails and t/conf w/D. Friedland re EAG work and budget for team mtg (.2); client team zoom mtg on status/strategy w/D. Friedland (.8);	MPR	1.20	\$750.00	\$900.00
Service	08/07/2024	1110 - Claim Management Issues: mtg w/ K. Holmes regarding potential objs to claims	MPR	0.10	\$750.00	\$75.00
Service	08/08/2024	1108 - Employment, Billing & Compensation: Conduct legal research regarding hiring of expert witnesses.	EMR	2.50	\$450.00	\$1,125.00
Service	08/08/2024	1109 - Asset Analysis & Recovery: Emails w/J. Jaeger re terms of engagement; mtg w/E. Reyes re same	MPR	0.20	\$750.00	\$150.00
Service	08/09/2024	1108 - Employment, Billing & Compensation: Review and update July 2004 invoice and prepare draft R&R July 2024 fee statement pursuant to alternative compensation procedures order	DTF	0.40	\$195.00	\$78.00
Service	08/09/2024	1106 - Misc Motions & Court Hearings: Review and prepare all prior document production in discovery pursuant to Rule 2004 motion and court order, and prepare for review of appraiser	DTF	0.60	\$195.00	\$117.00
Service	08/09/2024	1109 - Asset Analysis & Recovery: Review appraiser retention issues and email w/J. Jaeger re same (.2); review appraiser engagement letter, and prep of email to J. Jaeger re same (.3)	MPR	0.50	\$750.00	\$375.00
Service	08/09/2024	1108 - Employment, Billing & Compensation: review monthly fee statement/invoice for filing	MPR	0.10	\$750.00	\$75.00

Service	08/09/2024	1108 - Employment, Billing & Compensation: Begin preparing application to employ LWHA as appraiser for the Debtor, including preparing email to Jonathan Jaeger at LWHN providing information to run conflicts check.	EMR	0.30	\$450.00	\$135.00
Service	08/09/2024	1108 - Employment, Billing & Compensation: Review and prepare final revisions to Richman & Richman's monthly fee request.	EMR	0.50	\$450.00	\$225.00
Service	08/12/2024	1108 - Employment, Billing & Compensation: Draft proposed order conditionally approving payment of July 2024 Richman & Richman fees and expenses	DTF	0.20	\$195.00	\$39.00
Service	08/12/2024	1106 - Misc Motions & Court Hearings: Review draft application to employ appraiser and draft 21-day notice for service of application to employ to creditors	DTF	0.40	\$195.00	\$78.00
Service	08/12/2024	1108 - Employment, Billing & Compensation: Continue preparing Application to Employ LWHA as Appraiser for the Debtor and Declaration of Jonathan Jaeger in support of Application.	EMR	1.80	\$450.00	\$810.00
Service	08/12/2024	1108 - Employment, Billing & Compensation: Review Jaeger engagement letter, and prep of email to client team re same (.2); t/conf w/R. Erkert re appraiser status (.1)	MPR	0.30	\$750.00	\$225.00
Service	08/12/2024	1112 - Debtor Meetings & Communications: t/conf w/M. Flaherty re status and mtg sched	MPR	0.10	\$750.00	\$75.00
Service	08/13/2024	1106 - Misc Motions & Court Hearings: Revise and finalize notice of debtor's application to employ appraiser	DTF	0.20	\$195.00	\$39.00
Service	08/13/2024	1106 - Misc Motions & Court Hearings: Prepare exhibit to declaration re: debtor's application to employ appraiser	DTF	0.20	\$195.00	\$39.00
Service	08/13/2024	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ LWHA as Appraiser for the Debtor.	EMR	1.20	\$450.00	\$540.00
Service	08/13/2024	1108 - Employment, Billing & Compensation: Work on app to employ LW (.4); work on Jaeger Dec (.3); work on notice of app to employ (.1); prep of email to J Jaeger re same (.1)	MPR	0.90	\$750.00	\$675.00

Service	08/14/2024	1106 - Misc Motions & Court Hearings: Update notice of application to employ appraiser for final review and filing with court	DTF	0.20	\$195.00	\$39.00
Service	08/14/2024	1106 - Misc Motions & Court Hearings: Prepare exhibits to appraiser declaration in support of application to employ appraiser	DTF	0.30	\$195.00	\$58.50
Service	08/14/2024	1108 - Employment, Billing & Compensation: Prepare final revisions to Application to Employ LW Hospitality Advisors as Appraiser for the Debtor.	EMR	0.80	\$450.00	\$360.00
Service	08/14/2024	1108 - Employment, Billing & Compensation: Begin preparing Richman & Richman LLC's first interim fee application.	EMR	0.40	\$450.00	\$180.00
Service	08/14/2024	1110 - Claim Management Issues: Draft motion for estimation of claim	KAH	0.50	\$275.00	\$137.50
Service	08/14/2024	1108 - Employment, Billing & Compensation: Begin review and preparation of all invoices in support of draft First Interim Fee Application	DTF	2.20	\$195.00	\$429.00
Service	08/14/2024	1108 - Employment, Billing & Compensation: review final app to employ LW; (.2) review notice of app to employ LW (.1); t/conf w/J. Jaeger re same (.1)	MPR	0.40	\$750.00	\$300.00
Service	08/15/2024	1110 - Claim Management Issues: review filed claims to ascertain moving forward with objections	CAR	0.30	\$575.00	\$172.50
Service	08/15/2024	1108 - Employment, Billing & Compensation: Continue draft first interim fee application	DTF	2.70	\$195.00	\$526.50
Service	08/15/2024	1112 - Debtor Meetings & Communications: Prep of agenda and email for weekly status/strategy mtg (.2); status/strategy zoom mtg w/client team and D. Friedland (.8)	MPR	1.00	\$750.00	\$750.00
Service	08/16/2024	1108 - Employment, Billing & Compensation: Continue review of file and invoices and preparing draft first interim fee application	DTF	2.80	\$195.00	\$546.00
Service	08/16/2024	1102 - Case Administration / US Trustee: T/conf w/D. Friedland and W. Pederson re management agreement issues and coordination with WL	MPR	0.30	\$750.00	\$225.00
Service	08/16/2024	1110 - Claim Management Issues: Begin reviewing Proof of Claim information to determine treatment of each, including	EMR	0.50	\$450.00	\$225.00

bases for objections, if any.						
Service	08/17/2024	1102 - Case Administration / US Trustee: Prep of email to EAG team re calculation issue on UST quarterly fees	MPR	0.20	\$750.00	\$150.00
Service	08/19/2024	1102 - Case Administration / US Trustee: Review WL info provision issues for MORS and prep of related emails (.4); teams mtg w/D. Friedland and W. Pederson re UST fees and WL info provision (.1)	MPR	0.50	\$750.00	\$375.00
Service	08/19/2024	1102 - Case Administration / US Trustee: Conduct email exchange with Shaq Williams from EA Advisory Group to provide information needed for July 2024 monthly operating report.	EMR	0.20	\$450.00	\$90.00
Service	08/20/2024	1102 - Case Administration / US Trustee: prep of email to WL counsel re upcoming disbursements from operating account	MPR	0.20	\$750.00	\$150.00
Service	08/20/2024	1112 - Debtor Meetings & Communications: Email to D. Friedland re client meeting (.1); work on agenda for weekly client meeting, including attachments to be reviewed from EAG (.2)	MPR	0.30	\$750.00	\$225.00
Service	08/21/2024	1112 - Debtor Meetings & Communications: Review EAG materials for client mtg (.3); zoom client strategy mtg w/D. Friedland (.9)	MPR	1.20	\$750.00	\$900.00
Service	08/21/2024	1102 - Case Administration / US Trustee: Review and finalize July 2024 Monthly Operating Report.	EMR	0.30	\$450.00	\$135.00
Service	08/26/2024	1102 - Case Administration / US Trustee: emails w/J. Cordova re lender info on disbursements and info requests re MOR (.2)	MPR	0.20	\$750.00	\$150.00
Service	08/26/2024	1104 - DIP Financing / Cash Collateral: review D. Friedland emails re adequate protection payment (.2)	MPR	0.20	\$750.00	\$150.00
Service	08/26/2024	1108 - Employment, Billing & Compensation: emails re Sikich engagement (.2)	MPR	0.20	\$750.00	\$150.00
Service	08/28/2024	1109 - Asset Analysis & Recovery: attention to lenders' followup on appraisal, discovery, and MOR Qs, including emails w/F. DiCatri, J. Cordova and D. Friedland (.5)	MPR	0.50	\$750.00	\$375.00
Service	08/28/2024	1108 - Employment, Billing & Compensation: Phone call and email	EMR	0.30	\$450.00	\$135.00

exchange with Jennifer Cordova to determine and confirm Sikich's fees for preparing 2023 federal and state income tax returns.

Quantity Subtotal 40.6

Services Subtotal \$17,911.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	07/18/2024	Copy Expense: Stretto Printing/Copying Expense: Debtor's Motion to Extend Exclusivity Period for Filing a Chap 11 Plan and Disclosure Statement Debtors (Doc 195) and Notice of Debtor's Motion for Entry of Order Extending the Exclusive Periods (Doc 196)	1.00	\$197.40	\$197.40
Expense	07/18/2024	Postage Expense: Stretto Postage Expense: Debtor's Motion to Extend Exclusivity Period for Filing a Chap 11 Plan and Disclosure Statement Debtors (Doc 195) and Notice of Debtor's Motion for Entry of Order Extending the Exclusive Periods (Doc 196)	1.00	\$91.18	\$91.18
Expense	08/01/2024	Mileage: Roundtrip mileage for Attorney M. Richman to attend hearing RE Case Management and Payment of Adequate Protection Motion	131.80	\$0.67	\$88.31
Expenses Subtotal					\$376.89

Time Keeper	Position	Quantity	Rate	Total
Kayla Holmes	Associate	8.5	\$275.00	\$2,337.50
Eliza Reyes	Associate	9.0	\$450.00	\$4,050.00
Claire Richman	Partner	0.8	\$575.00	\$460.00
Michael Richman	Partner	12.1	\$750.00	\$9,075.00
David Fowle	Paralegal	10.2	\$195.00	\$1,989.00
Quantity Total				40.6
Subtotal				\$18,288.39
Total				\$18,288.39

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$52,507.10	+ \$18,288.39) - (\$0.00) = \$70,795.49

Richman & Richman LLC Trust - Advanced Fees

Date	Type	Notes	Matter	Receipts	Payments	Balance
04/06/2024		Advance Fee Deposit	Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$25,000.00	\$25,000.00
04/09/2024			Wisconsin & Milwaukee Hotel LLC/-2024.00023		\$23,000.00	\$48,000.00
04/09/2024		Payment for invoice #724	Wisconsin & Milwaukee Hotel LLC/-2024.00023	\$16,174.00		\$31,826.00
06/25/2024		Payment for invoice #875	Wisconsin & Milwaukee Hotel LLC/-2024.00023	\$31,826.00		\$0.00
Richman & Richman LLC Trust - Advanced Fees Balance					\$0.00	

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

Check/Cash Payments: Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

Credit Card Payments: Via LawPay at www.RandR.law (or attached link)

Wire Instructions: Account Name: Richman & Richman LLC (General Checking)
 Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732
 Bank Name and Address: BMO Harris Bank
 ABA: 071025661 SWIFT Code HATRUS44 Acct No. 4838178298